

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268

PERIODIC REPORTING OF SERVICE PERFORMANCE

Docket No. RM2022-7

**UNITED STATES POSTAL SERVICE'S MOTION FOR AN EXTENSION
OF TIME TO IMPLEMENT CERTAIN ELEMENTS OF THE POSTAL
SERVICE'S ONLINE DASHBOARD**
(March 14, 2023)

Pursuant to Rule 3010.162 of the Postal Regulatory Commission's (Commission's) Rules of Practice (39 C.F.R. § 3010.162), the United States Postal Service (Postal Service) respectfully moves to extend the time for implementing certain elements of the Postal Service's online Dashboard. The Postal Service will timely publish the weekly and monthly service performance data segments for Market Dominant products under the current deadline, and plans to accelerate publication of weekly, monthly, quarterly, and annual service performance data for Market Dominant mail *classes*. For the reasons explained herein, however, the Postal Service requests an additional 30 days to publish the annual and quarterly service performance data segments for Market Dominant *products*.

BACKGROUND

In its October 31, 2022, Comments to the Commission's September 21, 2022, Notice of Proposed Rulemaking in this docket (Order No. 6275), the Postal Service advised that, "[g]iven the robust set of proposed reporting requirements and the time necessary to review and implement these requirements, [a staggered] approach would be reasonable and practical and allow the Postal Service adequate time to implement

the new measurements and perform the necessary data gathering.” Comments of the United States Postal Service and Notice of Filing of Materials Under Seal, Docket No. RM2022-7 (Oct. 31, 2022) at 30. The Postal Service further advised that it had considered its current capacity to comply with existing reporting requirements as well as the Commission’s proposed reporting requirements related to the Public Performance Dashboard, and would reasonably need 300 days after the final regulations are issued to provide performance scores by Market Dominant product. *Id.* Accordingly, the Postal Service proposed the following staggered implementation deadlines reflective of the robust reporting requirements and the time and effort required to review and implement those Dashboard requirements:

- Phase 1: 150 days after the final regulations are issued, this will include score by Market Dominant Mail Class (First Class Mail, USPS Marketing Mail, Periodicals, Package Services);
- Phase 2: 210 days after the final regulations are issued, this will include scores by Service Standard, Non-Profit, and Reply Mail; and
- Phase 3: **300 days after the final regulations are issued, this will include scores by Market Dominant Products**, and Political/Election Mail.

Id. (emphasis added).

Although the Commission “notes that developing a data-heavy website can take a large amount of time and effort” and that “[t]he Postal Service deserves the opportunity to test the website extensively, and staggered deadlines should aid both development and testing,” it ruled that the Postal Service Reform Act of 2022 (PSRA) required that “the Dashboard must be implemented 60 days after receiving the reporting requirements from the Commission and that it must necessarily include, by this date, reporting by ‘type of market-dominant product.’” Order Revising Rules for Periodic Reporting of Service Performance, Docket No. RM2022-7, Order 6439 (February 9,

2023) at 26-27 (citing 39 U.S.C. § 3692(c)(2), (8)). Accordingly, the Commission imposed the following schedule:

- (1) 60 days after the regulations are issued, the Dashboard shall include scores by Market Dominant product;
- (2) 150 days after the regulations are issued, the Dashboard shall include scores by Market Dominant mail class;
- (3) 210 days after the regulations are issued, the Dashboard shall include scores by service standard and for nonprofit and Reply Mail; and
- (4) 300 days after the regulations are issued, the Dashboard shall include scores for political and election mail.

Id. at 27.

Despite the significantly reduced time provided to implement the Dashboard and perform the necessary data gathering, the Postal Service expects to substantially comply with, and in part accelerate, the Commission's deadlines. Thus, the Postal Service anticipates implementing the Dashboard to include *weekly and monthly* data for Market Dominant products *and* mail classes within the specified 60-days—*i.e.*, by May 19, 2023—which would accelerate compliance with the 150-day deadline for mail class information by 90 days, and to meet the 210-day deadline for service standard reporting, nonprofit, and Reply Mail, and the 300-day deadline for Political and Election Mail scores. As explained below, however, the Postal Service will not be able to provide *annual and quarterly* performance information by product (or class¹) by the

¹ At that same time, the Postal Service would also include performance information by mail class, which represents a 60-day *acceleration* of the current 150-day deadline required for annual and quarterly performance information by mail class.

currently specified deadline of May 19, 2023, but will be able to do so by June 20, 2023.²

DISCUSSION

Among other requirements, the PSRA specifies that the online dashboard must include “performance information for different time periods, including annual, quarterly, monthly, and weekly segments....” 39 U.S.C. § 3692(c)(2)(C). The Postal Service, however, currently does not have the required data aggregated at the breakdown needed for the data to be made available for the Dashboard being developed. These data elements are not part of the aggregates that are used for the current reporting provided quarterly and annually. For example, the quarterly and annual reports that are currently provided to the Commission are prepared based on a fixed date (*i.e.*, the end of year or quarter), but the data for the dashboard need to be based on a running (updated weekly) time frame that goes back to the end of the period selected (*i.e.*, the beginning of the current quarter or fiscal year).

Significant effort is needed to develop these aggregates for all the time dimensions required (weekly, monthly, quarterly, and yearly). Because of the magnitude of the effort to develop these data aggregates, there is not enough time to complete the aggregates for all the time dimensions needed to comply with the 60-day schedule. In that regard, while the Postal Service expects to publish weekly and monthly performance information by product within the current 60-day schedule (and by class, 90 days in advance of the current deadline), annual and quarterly performance

² Thirty days past May 19, 2023, would be Sunday, June 18, and the following day, Monday, June 19, is a federal holiday; therefore, the quarterly and annual performance data would be published by the next day, June 20, 2023.

information will require additional time to be properly and accurately aggregated before it can be published in the required format. Moreover, calculating the quarterly and annual aggregates is not as simple as summing or averaging the weekly or monthly aggregates. Each time dimension aggregate must be aggregated and calculated separately (*i.e.*, not merely an average of averages) to be statistically accurate. New aggregates will need to be developed to make them available for the appropriate time segments needed for the Dashboard to show on user selected timeframes.

The Postal Service estimates that it will require 1080 additional workhours to prepare the annual and quarterly performance information beyond what is required for weekly and monthly performance information. These additional workhours comprise developing software components and data structures to aggregate and store data for optimized access by the online Dashboard (approximately 510 hours) and comprehensive software integration testing, regression testing, and data validation (approximately 570 hours) to ensure that annual and quarterly service performance data remain accurate, reliable, and representative. The size, scale, complexity, and regulatory importance of the Service Performance Measurement (SPM) system necessitate that all due diligence is exercised when updates are made to any component of the system.³

As described above, the Commission felt compelled to order “scores by Market Dominant product” on the Dashboard within 60 days, given the language of the PSRA.

³ It is impractical and unworkable to add resources to the project to accelerate preparation of the annual and quarterly data given the timing of the deadlines, as hiring, onboarding, and training will take longer than the extension of time we are requesting. Moreover, the work to locate and train such additional resources would necessarily require the participation of those assets already engaged in the Dashboard project, thereby diverting capacity away from the ongoing work.

Order No. 6439 at 27. To be sure, the PSRA requires the Postal Service to provide “a publicly available Website with an interactive webtool that provides performance information for market-dominant products,” 39 U.S.C. § 3692(c)(1), and to make that Website available to the public within 60 days of the Commission’s own requirements and recommendations. 39 U.S.C. § 3692(c)(8). The Postal Service fully expects to comply with those statutory requirements, by making publicly available on its Website service performance scores for Market Dominant products within 60 days. Those scores can initially be segmented by week and month.

The Postal Service also expects that it can add the annual and quarterly segments within 30 extra days, and the PSRA affords sufficient discretion to the Commission to permit that short extension of time for those two additional segments. Indeed, beyond requiring “a publicly available Website with an interactive webtool that provides performance information for market-dominant products” within 60 days of the Commission’s requirements and recommendations, 39 U.S.C. § 3692(c)(1), (8), the PSRA delegated to the Commission the responsibility to develop reasonably the details of those requirements, including specifically for the time period segments for the Dashboard reporting. See 39 U.S.C. § 3692(b)(1)(C), (c)(2)(A)&(C). Given the short additional time needed to add the annual and quarterly segments, granting the requested extension limited to those segments would be well within the Commission’s reasonable discretion under the PSRA and will improve the accuracy, reliability, and usability of the dashboard.

Alternatively, the Commission could amend the effective date of the rule by an additional 30 days, to April 19, 2023, to the limited extent that it pertains to the

availability of annual and quarterly performance information on the Dashboard. The effective date of March 20, 2023, would remain for all other aspects of the rule.

CONCLUSION

As demonstrated above, the Postal Service will not be able to meet the currently established schedule for publishing annual and quarterly performance information to the online Dashboard and requests that the schedule as it relates to the annual and quarterly information be extended by 30 days. The Postal Service will meet all other scheduled deadlines—although the Postal Service expects to significantly accelerate compliance with the deadline for publishing performance information by mail class.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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March 14, 2023